

Donald Webster

08/09/02 12:35 PM

To: Donald Webster/R4/USEPA/US@EPA

cc: Doug McCurry/R4/USEPA/US@EPA, dwilliams@grenadamfg.com,
Lael Butler/R4/USEPA/US@EPA, Louis_Crawford@deq.state.ms.us

Subject: Re: Closure Plan for Chrome Plating Area



Addendum:

7. Please report the historic pH for MW-23 and MW-24 in addition to Chromium +3 and +6 results.
Donald Webster

Donald Webster

08/09/02 12:30 PM

To: dwilliams@grenadamfg.com

cc: Louis_Crawford@deq.state.ms.us, Doug
McCurry/R4/USEPA/US@EPA, Lael Butler/R4/USEPA/US@EPA

Subject: Closure Plan for Chrome Plating Area

Dear Mr. Williams;

The Environmental Protection Agency (EPA) has reviewed your Assessment Report and Closure Plan for the Chrome Plating Area dated July 23, 2002. Measured soil concentrations during the assessment exceeded the EPA Region 9 PRG of 64 mg/kg but were not above the EPA Region 3 RBC of 6,400 mg/kg. The acidity was quite low at PL-2 and SS-3, in the pH range of approximately 3 to 5 in some samples at depth.

The Closure Plan must be revised and resubmitted. EPA has the following official comments which we are transmitting to you via E-mail in order to expedite the closure process:

1. Does the facility have semiannual Chromium monitoring data for the closed Equalization Lagoon from MW-23 that it has not presented in the Closure Plan? If so, the facility should present this data in a summary table for the regulatory agency to review prior to making a final decision on the method of closure.
2. If the existing data continue to show reduction of historic chromium levels, EPA will allow closure in place with possible low-tech remediation, semi-annual monitoring, and long term institutional control.
3. The facility must examine the technical remedial alternatives for neutralizing the acidity of the soil under the Chrome Plating Area without soil removal. EPA feels that if the acidity under the Chrome Plating Area were neutralized it would drive the Chromium +6 equilibrium toward Chromium +3 thereby reducing the environmental threat posed by the Chromium +6.
4. The facility must plan on sampling monitoring wells MW-23 and MW-24 indefinitely on a semiannual schedule if the Chrome Plating Area is closed with waste in place.
5. An Institutional Control with a life span as long as that of the plant must be proposed by the facility and put in place by mutual agreement. EPA prefers a Consent Order or an Easement. A deed notice alone will not be adequate.
6. The Institutional Control must contain a survivable commitment to close the unit in accordance with appropriate future existing environmental laws governing hazardous wastes for the appropriate future land

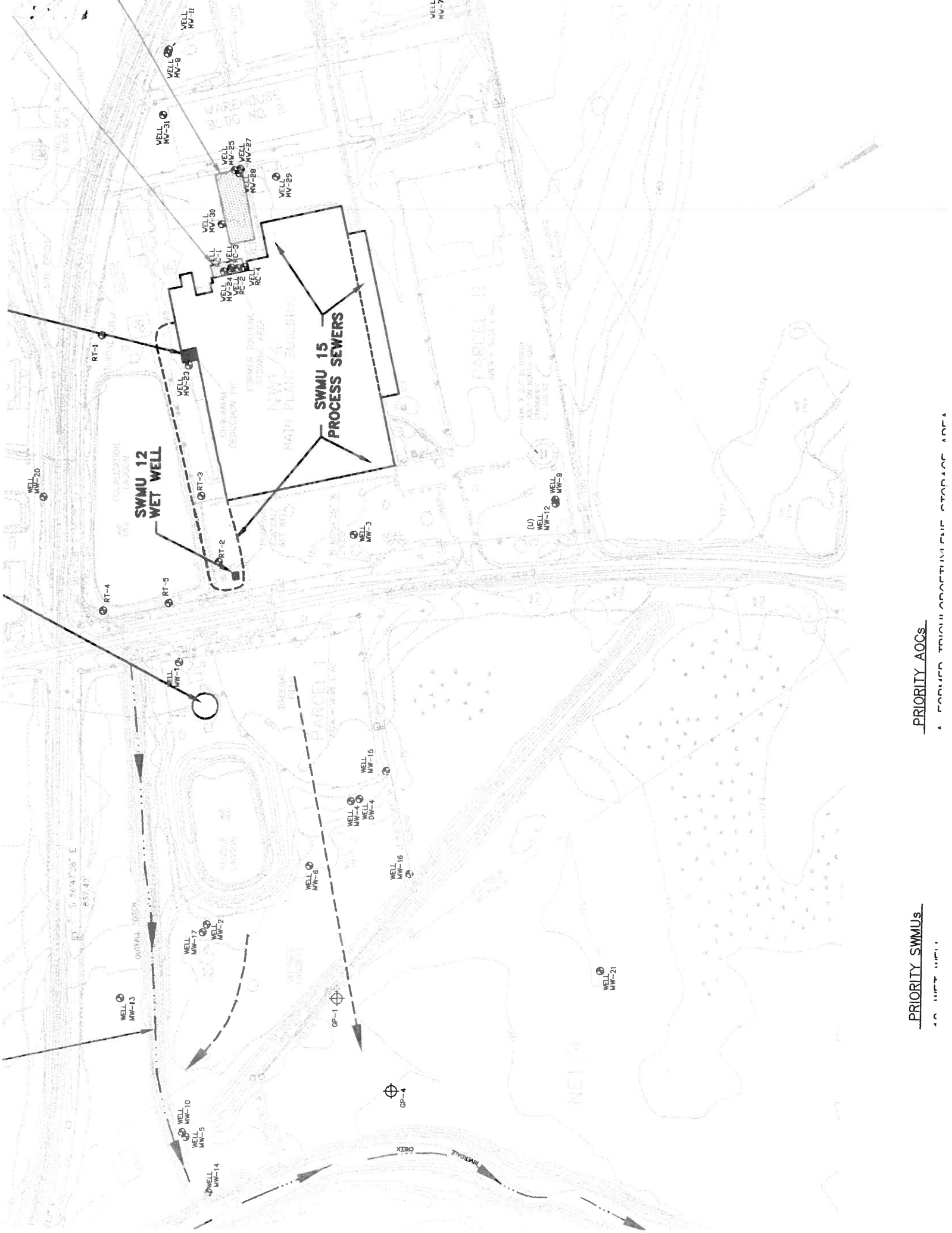
Docket Number 450832

use scenario for the site, be it industrial or residential.

I would be grateful if you would forward this E-mail message to John Devic and John Bozick. If you have any questions, please contact me at (404) 562-8469.

Sincerely,

Donald Webster



PRIORITY SWMUs

PRIORITY AOCs

AS SHOWN

A FOCUS THROUGHOUT THE STARTUP AREA